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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

XIAO YE BAI,

Petitioner,

vs.

STATE OF NEVADA, *et al.*,

Respondent(s).

Case No. 2:20-cv-02042-KJD-NJK

ORDER ON

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO SECOND AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 24)**

(FIRST REQUEST)

Respondents move this Court for an enlargement of time of 60 days from the current due date of August 8, 2022, up to and including October 7, 2022, in which to file their Answer to Second Amended Petition for Writ of Habeas Corpus (ECF No. 24). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the first enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: August 8, 2022.

Submitted by:

AARON D. FORD
Attorney General

By: *s/ Jamie Stilz*
Jamie Stilz (Bar. No. 13772)
Deputy Attorney General

DECLARATION OF JAIME STILZ

I, JAIME STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Xiao Ye Bai v. State of Nevada, et al.*, Case No. 2:20-cv-02042-KJD-NJK, and as such, have personal knowledge of the matters contained herein.

2. This is my first request for an extension to file the Answer to the Second Amended Petition for Writ of Habeas Corpus (ECF No. 24), and this Motion is made in good faith and not for the purpose of delay.

3. The Answer is currently due on August 8, 2022.

4. I am unable with due diligence to timely complete the Answer herein. I am still attempting to manage ongoing medical/health issues. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Answer in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Bai, and he does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 60 days, up to and including October 7, 2022, to file the Answer to the Second Amended Petition for Writ of Habeas Corpus (ECF No. 24).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of August, 2022.

/s/ Jamie Stilz
Jamie Stilz (Bar No. 13772)
Deputy Attorney General

IT IS SO ORDERED:

John G. O'Donnell

UNITED STATES DISTRICT JUDGE

Dated: September 1, 2022